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Attorneys for Amir Shahmirza
(Agent for Komir, Inc.) and Komir, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**EXHIBIT COMPENDIUM SUBMITTED
IN SUPPORT MOTION FOR PARTIAL
SUMMARY JUDGMENT OF ISSUES IN
REORGANIZED DEBTORS OBJECTION
TO CLAIM #2090 AND IN CLAIMANT'S
RESPONSE THERETO:
VOLUME 1 - Exhibits 1 and 2**

Date: April 11, 2023

Time: 10:00 a.m.

**Place: (Tele/Videoconference Appearances
Only)**

**United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102**

Amir Shahmirza, as agent of, and acting on behalf of, Komir, Inc. ("Komir" or "Claimant"),
submits this Exhibit Compendium in Support Motion for Partial Summary Judgment of Issues in
Reorganized Debtors Objection to Claim #2090 and in Claimant's Response Thereto in support of
Claimant's Motion for Partial Summary Judgment of Issues in Reorganized Debtors Objection to

1 Claim #2090 and in Claimant's Response Thereto:

2 Exhibit 1: Record of Survey No. 3259-A

3 Exhibit 2: Real Estate Survey Map with Aerial

4 Respectfully submitted.

5 Dated: January 31, 2023

COHEN AND JACOBSON, LLP

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7 By: /s/ Lawrence A. Jacobson
8 Lawrence A. Jacobson
9 Attorneys for Claimant and Respondent
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EXHIBIT 1

PURPOSE & BASIS OF SURVEY

THE PURPOSE OF THIS SURVEY IS TO SET MONUMENTS ALONG THE
BOUNDARY LINE OF DEED HAVING DOCUMENT #2000-160010.

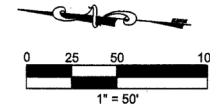
THE MONUMENTS SET BY RECORD OF SURVEY NO. 3206 REPRESENT THE BEST EVIDENCE OF THE LOCATION OF THE SUBJECT PARCEL BECAUSE SAID RECORD OF SURVEY RETRACED THE ADJOINING SUBDIVISION INCLUDING THE TERMINUS OF WALNUT STREET AND THE CITY PARK DESCRIBED IN THE DIRECTOR'S DEED BEING RECORDED IN VOLUME 458, OFFICIAL RECORDS OF SAN MATEO COUNTY, SAID RECORD OF SURVEY SETTING THE CORNERS AND DISTANCES WITH THE HEREIN DESCRIBED ROTATION, AND SAID DIRECTOR'S DEED ALSO BEING REFERENCED IN THE DEED FOR THE SUBJECT PARCEL BEING DOC #2000-160010, OFFICIAL RECORDS OF SAN MATEO COUNTY AS THE POINT OF COMMENCEMENT.

REFERENCES:

- (R1) RECORD OF SURVEY MAP NO. 3206, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN MATEO IN BOOK 46 OF MAPS AT PAGE 3, ON JUNE 25, 2018
- (R2) GRANT DEED, DOCUMENT #2000-160010, RECORDED IN THE OFFICE OF THE RECORDER OF SAN MATEO COUNTY ON DECEMBER 18, 2000

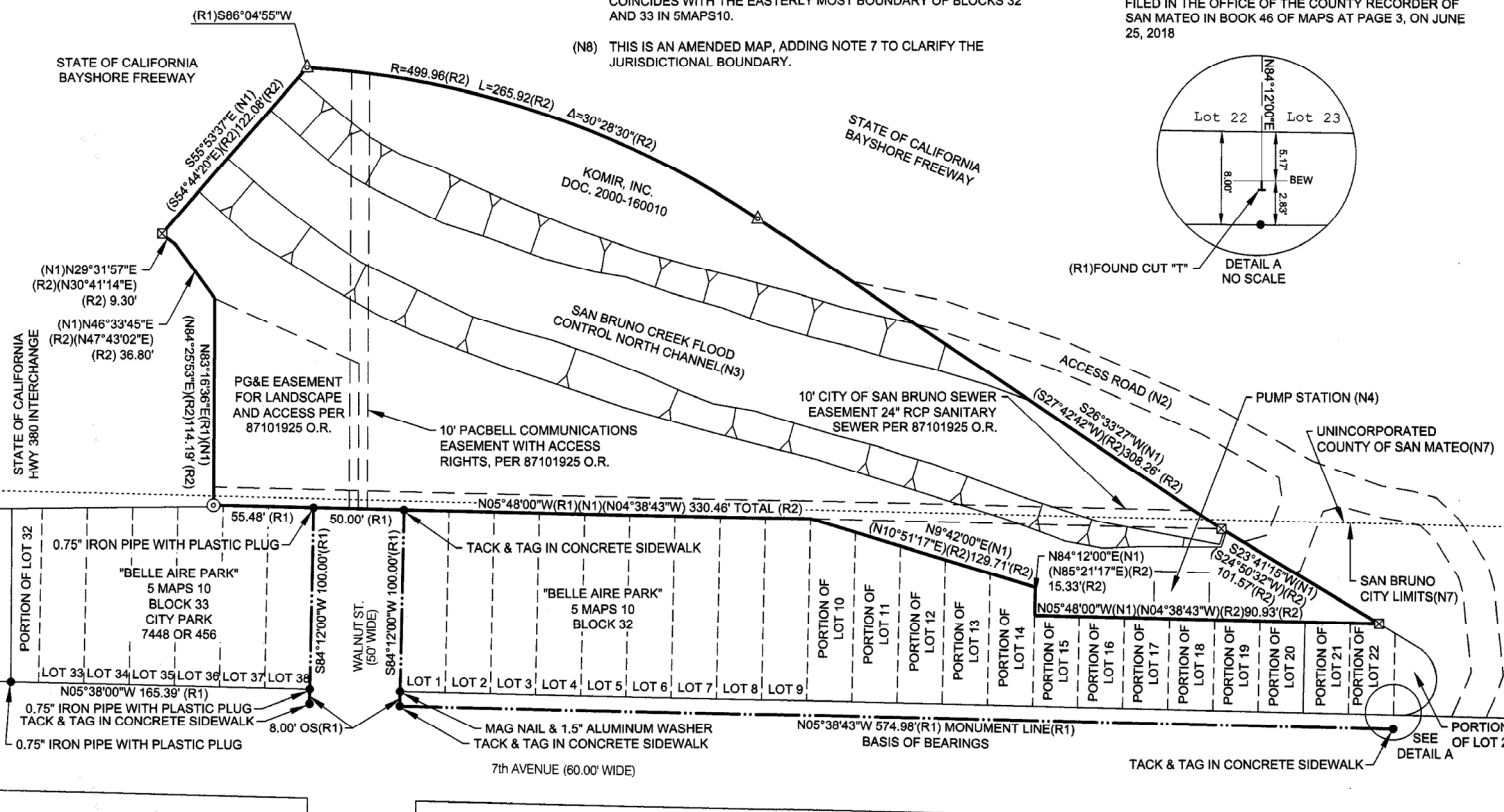
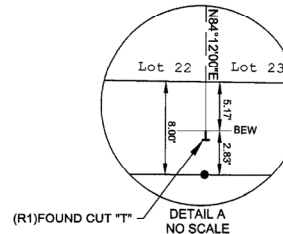
NOTES - CONTINUED

- (N7) THE JURISDICTIONAL BOUNDARY IS SHOWN AS AN OFFSET TO DIFFERENTIATE BETWEEN THE PROPERTY BOUNDARY. THE LINE COINCIDES WITH THE EASTERLY MOST BOUNDARY OF BLOCKS 32 AND 33 IN 5MAPS10.
- (N8) THIS IS AN AMENDED MAP, ADDING NOTE 7 TO CLARIFY THE JURISDICTIONAL BOUNDARY.



BASIS OF BEARINGS


















THE BEARING OF N5°48'00"E BETWEEN TWO MONUMENTS ON THE MONUMENT LINE ON SEVENTH AVE HAVING A DISTANCE BETWEEN THEM OF 574.58', AS SHOWN ON THE RECORD OF SURVEY MAP NO. 3206, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN MATEO IN BOOK 46 OF MAPS AT PAGE 3, ON JUNE 25, 2018



NOTES

- (N1) THE DIRECTOR'S DEED FROM THE STATE OF CALIFORNIA TO THE CITY OF SAN BRUNO PER VOL. 7448, PAGE 456 INDICATES THE BEARINGS & DISTANCES ARE ON THE CALIFORNIA COORDINATE SYSTEM, ZONE 3 AND HAVE BEEN ROTATED TO TRUE BEARING OF N5°48'00"W THE BASIS OF BEARINGS OF THIS SURVEY. THE ROTATION FROM TRUE BEARING TO GRID BEARING IS + 1°09'17". THE DEED FOR THE SUBJECT PROPERTY COMMENCES WITH A CALL TO THAT DEED, AND IS SO SAID ROTATION IS USED TO ORIENT THE PROPERTY. THE DISTANCES ARE GROUND DISTANCES SHOWN ON THIS MAP. MULTIPLY GROUND DISTANCE BY 0.999921006 TO OBTAIN GRID DISTANCE.
- (N2) THE SHOWN ACCESS ROAD ACROSS THE LANDS OF THE STATE OF THE CALIFORNIA IS SHOWN BASED ON THE LIMITS OF THE DRIVEN AREA, AND CONNECTS THE LAND LOCKED PORTION OF THE KOMIR, INC. PROPERTY WITH THE ONSITE ACCESS ROAD AND THE CITY RIGHT OF WAY ON SEVENTH AVENUE AT THE EXISTING CONCRETE DRIVEWAY.
- (N3) NO RECORD DOCUMENTATION FOUND FOR THE RIGHT-OF-WAY FOR THE SAN BRUNO FLOOD CONTROL NORTH CHANNEL.(N5)
- (N4) NO RECORD DOCUMENTATION FOUND FOR THE LANDS COMPRISING OF THE EXISTING PUMP STATION.(N5)
- (N5) DEED FROM THE STATE OF CALIFORNIA TO NEIL & MELANIE HILDEBRAND PROVIDES ACCESS FROM THE GRANTOR (STATE OF CALIFORNIA) WHO OWNS THE ADJACENT LANDS TO THE GRANTEE (NEIL & MELANIE HILDEBRAND).
- (N6) THE FLOOD CONTROL CHANNELL AND PUMP HOUSE (ITEMS 1 & 2) ARE MAINTAINED BY THE CITY OF SAN BRUNO THROUGH AN AGREEMENT WITH COUNTY OF SAN MATEO FLOOD CONTROL DEPARTMENT.

LEGEND

-  BOUNDARY LINE/PROPERTY LINE (P/L)
 LINE OF SURVEY/MONUMENT LINE(R)
 LOT LINES PER ORIGINAL SUBDIVISION
 EASEMENT AS NOTED
 SET TACK & 0.75" TAG, STAMPED "L.S. 9392" IN
 CONCRETE FENCE POST
 SET ALUMINUM SET SKE & 1.5" ALUMINUM TAG,
 STAMPED "L.S. 9392"
 SET 0.75" IRON PIPE AND PLASTIC PLUG,
 STAMPED "L.S. 9392"
 FOUND MONUMENT AS NOTED STAMPED "LS 5577"
 PER 46 LLS 3
 OFF SET FROM PROPERTY LINE
 OS
 BEW
 TOP AND BOTTOM OF CREEK WITH DIRECTION OF SLOPE
 BACK EDGE OF SIDEWALK

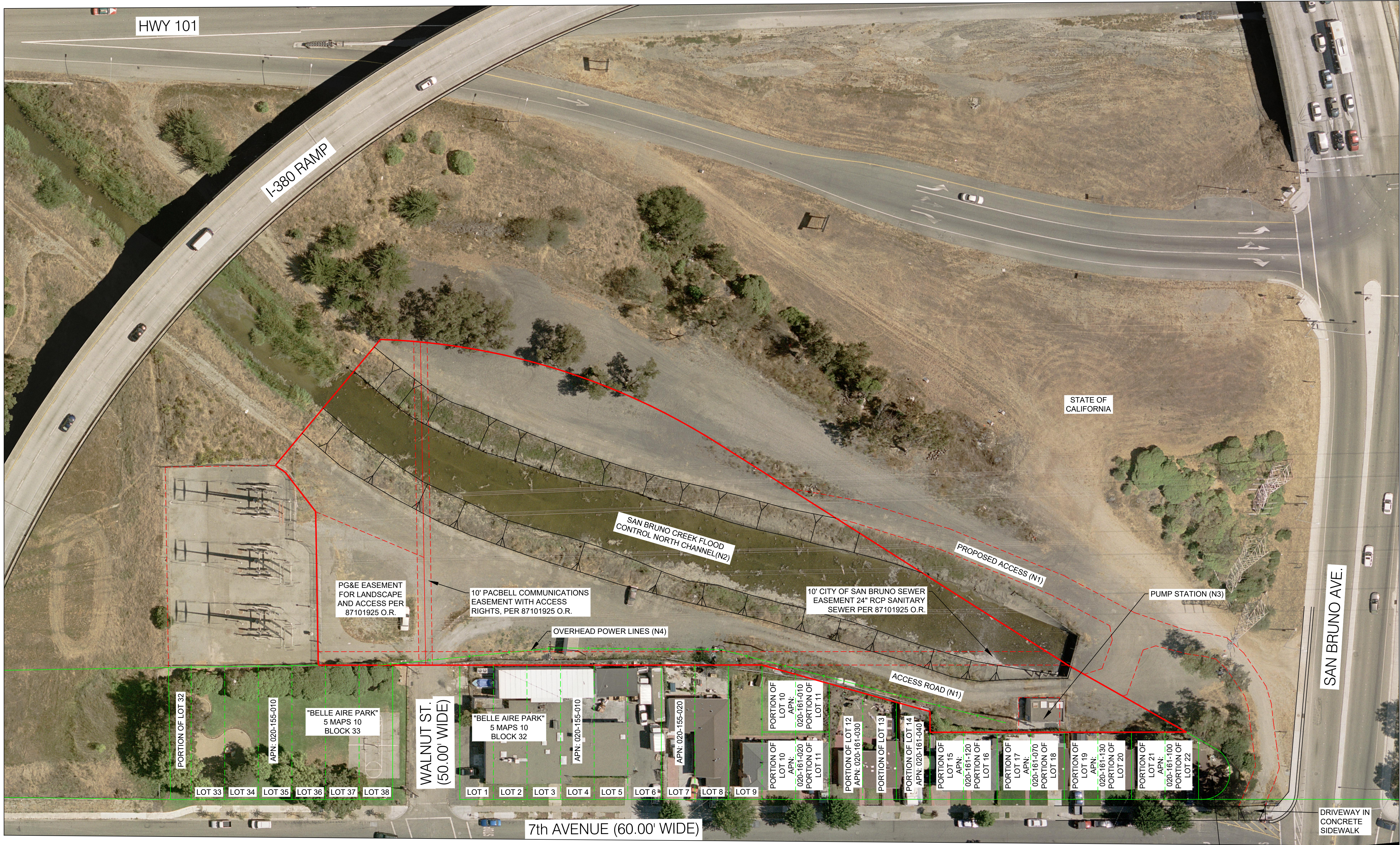
Professional Land Services

James K. O'Connell, P.L.S.
California License Number : 9392
901 Sneath Lane, #117
San Bruno, CA 94066
Phone/FAX 650-244-9667

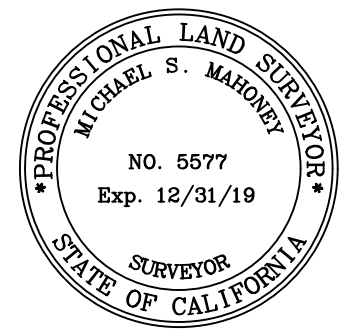
- Site Planning
- Title Investigations
- Legal Descriptions
- Surveying & Mapping



EXHIBIT 2



SCALE: 1" = 40'
JANUARY 2018



PREPARED BY:
MICHAEL S. MAHONEY, PLS

LEGEND

- KOMIR INC. OWNERSHIP
- BOUNDARY OF EASEMENT AS NOTED
- ADJOINING PROPERTY LINES
- ORIGINAL LOT LINES PER SUBDIVISION

NOTES

- (N1) ONSITE ACCESS ROAD CONNECTS WALNUT STREET RIGHT-OF-WAY WITH LANDS OF THE STATE OF CALIFORNIA. THE PROPOSED ACCESS ACROSS THE LANDS OF THE STATE OF CALIFORNIA WOULD CONNECT THE LAND LOCKED PORTION OF THE KOMIR, INC. PROPERTY WITH THE EXISTING ACCESS ROAD AND THE CITY RIGHT OF WAY ON 7TH AVENUE AT THE EXISTING CONCRETE DRIVEWAY.
- (N2) NO RECORD DOCUMENTATION FOUND FOR THE RIGHT-OF-WAY FOR THE SAN BRUNO FLOOD CONTROL NORTH CHANNEL.
- (N3) NO RECORD DOCUMENTATION FOUND FOR THE LANDS COMPRISING OF THE EXISTING PUMP STATION.
- (N4) NO RECORD DOCUMENTATION FOR THE EXISTING OVERHEAD POWER LINES LYING 11± EASTERLY OF THE WESTERLY PROPERTY LINE OF KOMIR, INC.

NOTES (CONT.)

- (N5) DEED FROM THE STATE OF CALIFORNIA TO NEIL & MELANIE HILDEBRAND PROVIDES ACCESS FROM THE GRANTOR (STATE OF CALIFORNIA) WHO OWNS THE ADJACENT LANDS TO THE GRANTEE (NEIL & MELANIE HILDEBRAND).
- (N6) THE FLOOD CONTROL CHANNELL AND PUMP HOUSE (ITEMS 1 & 2) ARE MAINTAINED BY THE CITY OF SAN BRUNO THROUGH AN AGREEMENT WITH COUNTY OF SAN MATEO FLOOD CONTROL DEPARTMENT.

F:\AMIR CALTRANS SBI\Realstate summary map.dwg@ 04:47:54 PM

NO.	REVISIONS	DATE

JOB# : 2018.1001
DATE : 01/15/18
100% SUBMITTAL

(650) 244-9667
jgmahoney@pls-corp.com
901 Sneath Ln, Suite 117
San Bruno, CA 94066

Professional Land Services
LAND DEVELOPMENT SPECIALISTS

DESIGNED: JKO
DRAWN: JKO
APPROVED: MSM

PREPARED FOR:
ASI CONSULTING
ENGINEERS
10 ROLLINS ROAD, #217
MILLBRAE, CA 94030

TITLE:
REAL ESTATE SUMMARY MAP WITH AERIAL
0 WALNUT STREET
SAN BRUNO, CA 94066

SHEET 1
OF
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